

81598-13

9/16/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 16, 2014

Cheryl Wagner  
Agent for Rotam Limited  
c/o Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707

Subject: Label Notification per PRN 98-10 – Change Primary Brand Name  
Product Name: Rotam Clethodim MUP  
EPA Registration Number: 81598-13  
Application Date: September 4, 2014  
Decision Number: 495091

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The primary brand name for this product has been changed from "Ritter Clethodim MUP" to "**Rotam Clethodim MUP**" and noted in the product record.

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at [ondish.mindy@epa.gov](mailto:ondish.mindy@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish, for".

Kathryn V. Montague, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

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United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 81598-13	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None      Restricted
4. Company/Product (Name) Rotam Limited/Ritter Clethodim MUP	PM# 23	
5. Name and Address of Applicant (Include Zip Code) Rotam Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name: <b>NOTIFICATION</b> <b>SEP 16 2014</b>	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)  
Notification of change in primary brand name to Rotam Clethodim MUP. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* Certification must be submitted		If "Yes"      No. per Unit Packaging wgt.      container	If "Yes"      No. per Package wgt      container

3. Location of Net Contents Information  
 Label       Container

4. Size(s) Retail Container  
55 gal.

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product  
 Lithograph       Other \_\_\_\_\_  
 Paper glued  
 Stenciled

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Cheryl Wagner	Title Agent for Rotam Limited	Telephone No. (Include Area Code) (302) 635 7289
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**Certification**  
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received  
**(Stamped)**

2. Signature <i>Cheryl Wagner</i>	3. Title Agent for Rotam Limited
4. Typed Name Cheryl Wagner	5. Date September 4, 2014



**WRA**

Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7217 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

September 4, 2014

Document Processing Desk (NOTIF)  
ATTN: Kathryn Montague, PM Team 23  
Registration Division  
U.S. Environmental Protection Agency  
Office of Pesticide Programs (7504P)  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, Virginia 22202-4501

Dear Ms. Montague,

**Subject: Ritter Clethodim MUP, EPA Registration Number 81598-13  
Notification of Change in Primary Brand Name**

Wagner Regulatory Associates, Inc., as agent for Rotam Limited, respectfully notifies the Agency of a change in the primary brand name Ritter Clethodim MUP to **Rotam Clethodim MUP**. In support of this notification, the following documents are enclosed:

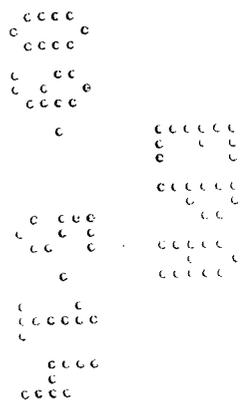
- Letter from Rotam Limited appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- 1 copy of the label

If you have any questions about this submission please contact the undersigned at [Cheryl@wagnerreg.com](mailto:Cheryl@wagnerreg.com) or (302) 635-7289.

Respectfully submitted,

*Cheryl Wagner*  
Cheryl Wagner  
Agent for Rotam Limited

Enclosures



# Rotam Clethodim MUP

## FOR MANUFACTURING HERBICIDES ONLY

**ACTIVE INGREDIENT:**

Clethodim [(E)-2-[1-[[[3-chloro-2-propenyl)oxy]imino]propyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one]..... 37.0%

**OTHER INGREDIENTS:**..... 63.0%**TOTAL:**..... 100.0%

Contains petroleum distillates.

**NOTIFICATION****SEP 16 2014**

### KEEP OUT OF REACH OF CHILDREN

### WARNING - AVISO

Si usted no entiende la etiqueta, bus que a alguien para que se la explique a usted en detalle.  
(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give any liquid to a person.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN:</b> Ingestion of this product or subsequent vomiting may result in aspiration of light hydrocarbon liquid which can cause pneumonitis. If ingested, probable mucosal damage may contraindicate the use of gastric lavage.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at <b>1-800-858-7378</b> , Monday through Friday, 9 a.m. to 5 p.m. After 5:00 p.m., call your poison control center at <b>1-800-222-1222</b> .	

EPA Reg. No. 81598-13

EPA Est. No. \_\_\_\_\_

Net Contents: \_\_\_\_\_

**Manufactured By:**

Rotam Limited  
26/F, E-Trade Plaza,  
24 Lee Chung Street  
Chai Wan, Hong Kong

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING.** Harmful if swallowed or absorbed through skin. Causes skin irritation. Causes moderate eye irritation. Do not get on skin or on clothing. Avoid contact with eyes. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

**ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use or store near heat or open flame.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be used to formulate herbicide products for the following use(s):

**1. Terrestrial Food Uses:**

- **Root Vegetables, except Sugar Beet - Crop Subgroup 1B**
- **Tuberous and Corm Vegetables - Crop Subgroup 1C**
- **Leaves of Root and Tuber Vegetables - Crop Group 2**
- **Bulb Vegetables - Crop Group 3**
- **Leafy Greens - Crop Subgroup 4A**
- **Leaf Petioles - Crop Subgroup 4B**
- **Head and Stem Brassica - Crop Subgroup 5A**
- **Leafy Brassica Greens - Crop Subgroup 5B**
- **Legume Vegetables (Dried and Succulent), except Soybean - Crop Group 6**
- **Fruiting Vegetables, except cucurbits - Crop Group 8**
- **Melon - Crop Subgroup 9A**
- **Squash/Cucumber - Crop Subgroup 9B**
- **Caneberry - Crop Subgroup 13-07A**
- **Bushberry - Crop Subgroup 13-07B**
- **Herbs - Crop Group 19A**
- **Individual Crops:** alfalfa, artichoke (Globe), asparagus, canola, clover, cotton, cranberry, dry beans, flax, garlic, hops, leaf lettuce, mint, mustard seed, dry bulb and green onions, peach, peanut (including perennial), safflower, sesame, soybean, sugar beet, sunflower, and turnip.

2. **Terrestrial Non-Food Uses:** conifer trees, Christmas trees, fallow land (and other non-producing agricultural areas), ornamentals, non-bearing food crops, non-crop or non-planted areas, golf courses, native prairie warm season grass restoration projects, and Niger seed (*Guizotia abyssinica*) grown for use as wild bird feed.
3. Uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
4. Uses for experimental purposes that are in compliance with EPA registration for the formulated products. Each formulator is responsible for obtaining EPA registration for their end-use product(s).

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Refillable container. Refill this container with clethodim only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. For final disposal, offer for recycling or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

**NOTICE:** Read the entire Directions for Use and Conditions for Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM LIMITED, or Seller. The Buyer and User shall assume all such risks, and Buyer and User agree to hold ROTAM LIMITED and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, ROTAM LIMITED warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to proper instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM LIMITED, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ROTAM LIMITED MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR NEITHER A PARTICULAR PURPOSE NOR ANY OTHER EXPENSES OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, ROTAM LIMITED or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM LTD AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.

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